

## **REMARKS**

### ***Claim Rejections – 35 U.S.C. § 102***

Claims 1, 2, 5 and 6 have been rejected under 35 U.S.C. § 102 twice, once over Japanese Unexamined Pat. App. Pub. No. H05-009740 to Ushigoe et al. (assigned to *NGK Insulators*), and once over U.S. Pat. No. 6,082,297 to Pollock et al.

Applicants address these separate rejections below in turn.

In *Ushigoe et al.*, as shown in Fig. 2 and as stated in paragraph [0015] of the reference, the electrode members are connected to respective "massive terminals " (as rendered in the machine translation—more precisely, clumplike or blob terminals). As against this, as described in paragraph [0004] of the present specification, when the joints are as in *Ushigoe et al.*, the structure corrodes through the joined portions, on account of which electrodes as recited in claim 1 of the present application are made seamless in order to enhance the electrodes' durability, which thus differs clearly from the cited reference. With the structure of *Ushigoe et al.*, the durability clearly degrades over that of the invention as recited in the present claims. In fact, *Ushigoe et al.* is structurally close to Comparative Example 1 (Fig. 7) in the present specification, and is therefore completely differs from the invention as recited in the present claims.

The *Pollock et al.* embodiment cited in the Office action is not a ceramic susceptor but rather a metallic heater. And although *Pollock et al.* sets forth that wires are joined, the specific joining method is unclear. Moreover, it is believed that inasmuch as it would appear that the termini on the side in Fig. 4 without the heater are connected to something, *Pollock et al.* differs from an implementation as in the present invention, in which there are no joints.

### ***Claim Rejections – 35 U.S.C. § 103***

#### **Claims 3, 4, 7 and 8; Ushigoe et al. '740 in view of Pollock et al. '297**

Claims 3, 4, 7 and 8 were rejected as being unpatentable over either of the Ushigoe et al. reference in view the Pollock et al. reference.

It is respectfully submitted that for the foregoing reasons presented in addressing the § 102 rejections, the patentability of the present application rests in claim 1 to begin with, and that the present reply is fully responsive to the § 103

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rejections of claims 3, 4, 7 and 8, in that these claims should be held allowable as depending directly or indirectly from claim 1.

Accordingly, Applicant courteously urges that this application is in condition for allowance. Reconsideration and withdrawal of the rejections is requested. Favorable action by the Examiner at an early date is solicited.

Respectfully submitted,

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